

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery
Master

**CONSENTED MOTION TO EXTEND THE TIME TO FILE
MOTION TO REDACT AND SEAL PORTIONS OF THE
HEARING TRANSCRIPT OF JANUARY 18, 2022**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Huahai U.S. Inc. (“Huahai U.S.”) and Solco Healthcare U.S., LLC (“Solco”, and collectively with ZHP, Huahai U.S., and Princeton, “the ZHP Parties”), by and through their counsel, and with the consent of Plaintiffs’ counsel, respectfully move to extend the time to file a Motion to redact and seal portions of the transcript of the hearing before Special Discovery Master Judge Vanaskie on January 18, 2022 (the “Jan. 18 Transcript”).

On January 18, 2022, the parties participated in a hearing before the Special Discovery Master regarding Plaintiffs' challenges to the ZHP Parties' Restricted Confidential designations for eleven (11) documents. During the hearing, Your Honor requested the parties to file supplemental letter briefs. The parties' briefs were filed on February 8, 2022. To date, no Order has been entered regarding the matters addressed during the January 18 hearing. The ZHP Parties anticipate the need to file a motion to redact and seal portions of the Jan. 18 Transcript pursuant to Local Rule 5.3(g), but the scope of any such motion to redact and seal is dependent upon the content of the Special Discovery Master's Order when issued.

Counsel for the ZHP Parties met and conferred with Plaintiffs' counsel regarding a Motion to Seal, and, in the course of that meeting, Plaintiffs consented to an extension of time for filing of any motion to redact and seal until fourteen (14) days following the entry of the Special Discovery Master's Order. *See* 2/17/2022 email exchange between J. Greenberg, Esq. and C. Geddis, Esq., attached hereto as Exhibit A.

Accordingly, the ZHP Parties, with the consent of Plaintiffs' counsel, respectfully request that the Court extend the time for filing a Motion to Redact and

Seal the Jan. 18 Transcript in accordance with the attached form of Order submitted herewith.

Dated: February 18, 2021

Respectfully submitted,

/s/ Julie S. Greenberg
Julie S. Greenberg, Esq.

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and Solco Healthcare U.S., LLC*

CERTIFICATE OF SERVICE

I, Julie S. Greenberg, Esq., hereby certify that complete copies of the foregoing ZHP Parties' Consented Motion to Extend the Time to File a Motion to Redact and Seal Portions of the Hearing Transcript Dated January 18, 2022 have been filed electronically on the docket for this matter and are available for viewing and downloading from the ECF system. These documents are being served upon the following counsel on February 18, 2022 through the ECF system, and a courtesy copy is being sent by email to:

Adam M. Slater, Esq.
Plaintiffs' Liaison Counsel
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
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/s/ Julie S. Greenberg